



Maria Patelis, Esq.

August 21, 2024

Magistrate Judge Sanket J. Bulsara
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Pollack v. Gordon, et al.
Docket No. : 23-cv-2376 KAM-SJB

Dear Honorable Sanket J. Bulsara:

This letter is filed in objection to Plaintiff's application filed by letter dated August 13, 2024 requesting Defendants' Plaintiff to provide responses to their document demands that comply with Federal Rule 34 and responses to interrogatories that comply with Federal Rule 33.

I will not address the Procedural Background which is not relevant to this instant case but does show that this dispute has been pending since the pandemic, that lead to the dissolution of Fusion Modeling Agency LLC by the Honorable Reginald Boddie on April 30, 2021.

We have provided the documents to the parties since 2020. Further, what I believe is the disconnect during the meet and confer is that Plaintiff has another attorney who participates in the calls but is very difficult to talk to and has been argumentative with me. I request as a professional courtesy since he is not listed as counsel on this case to not participate in the telephone conferences. During the meet and confer the Plaintiff did not even request a date for me to provide responses to their discovery demands.

I will provide responses again and make sure that the Response to Interrogatories is Verified by Defendant Jody Gordon and clarify whether documents are withheld or not. The Court should note that the Plaintiff has had access to bank records of the former LLC so many of these documents have been repeatedly provided through the years. Quite simply put, I had to breakdown the responses in separate emails and I asked Plaintiff to confirm receipt knowing that I

would be out of the country. There was no response to confirm receipt by Plaintiff. A simple email please send over the Exhibit would have been appreciated than being ambushed by two attorneys over trivial details. Further, I would request that only Mr. Kassel participate on the telephone phone calls. Thus, I would request that Defendants have until September 6, 2024 to provide Responses that are in compliance. There is no need for motion practice on this matter and Defendants have filed a pre motion request for dismissal on Plaintiff's claims.

There is no prejudice to any of the parties in this matter. We are awaiting responses to Defendants' First Request for Production Documents, Interrogatories and Request for Admission. Thank you.


Respectfully Submitted,

Maria Patelis, Esq.